

JOSHUA M. DICKEY
Nevada Bar No. 6621
ANDREA M. CHAMPION
Nevada Bar No. 13461
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
JDickey@BaileyKennedy.com
AChampion@BaileyKennedy.com

*Attorneys for Defendants Sahara Outpatient
Surgery Center, Ltd.; and Surgicare of Las
Vegas, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAUL B. CANALE, M.D., an individual and
Alabama resident,

Plaintiff,

v.

SAHARA OUTPATIENT SURGERY CENTER,
LTD., a Nevada limited partnership;
SURGICARE OF LAS VEGAS, INC., a Nevada
corporation; LANCE HICKMAN, an individual
and Tennessee resident; DOES I through X; ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:18-cv-01020-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR SAHARA
OUTPATIENT SURGERY CENTER,
LTD. AND SURGICARE OF LAS
VEGAS, INC.'S REPLY IN SUPPORT
OF THE MOTION TO DISMISS [ECF
NO. 6]**

[SECOND REQUEST]

Plaintiff Paul B. Canale, M.D. ("Plaintiff"), together with Defendants Sahara Outpatient Surgery Center, Ltd. and Surgicare of Las Vegas, Inc. (collectively, the "Surgery Center Parties"), by and through their respective attorneys of record, stipulate and agree as follows:

1. On June 19, 2018, the Surgery Center Parties filed and served their Motion to Dismiss [ECF No. 6].

2. Dr. Canale filed his Opposition to the Motion to Dismiss on July 10, 2018 [ECF No. 12].¹

¹ Dr. Canale's deadline within which to file his Opposition was extended by the parties' agreement and approved by the Court on June 30, 2018. (See ECF No. 9.)

3. On July 17, 2018, the parties stipulated and agreed that the Surgery Center Parties' reply should be continued from July 17, 2018 to at least July 24, 2018, as a professional courtesy to the Surgery Center Parties' counsel and further indicated that Dr. Canale was still considering the Surgery Center Parties' request for an additional week extension of their reply deadline, to July 31, 2018. (See ECF No. 14.)

4. Following the Court's approval of their Stipulation on July 17, 2018, Dr. Canale confirmed that he was agreeable to the Surgery Center Parties' additional week-long extension (to give the Surgery Center Parties' counsel adequate time to prepare the reply following a large document disclosure in an unrelated matter).

5. Therefore, the parties now hereby stipulate and agree that the Surgery Center Parties' reply should be further extended from July 24, 2018 to July 31, 2018.

6. This is the second stipulation for an extension of time for the Surgery Center Parties to file their reply in support of the Motion to Dismiss. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 20th day of July, 2018.

DATED this 20th day of July, 2018.

ERICKSON & WHITAKER PC

BAILEY ♦ KENNEDY

By: /s/ Brian C. Whitaker
BRIAN C. WHITAKER
1349 Galleria Drive
Suite 200
Henderson, NV 89014

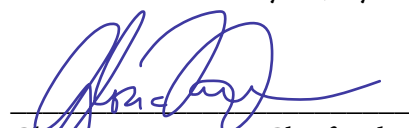
By: /s/ Andrea M. Champion
JOSHUA M. DICKEY
ANDREA M. CHAMPION
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Attorneys for Plaintiff Paul B. Canale, M.D.

*Attorneys for Defendants Sahara Outpatient
Surgery Center, Ltd. and Surgicare of Las
Vegas, Inc.*

IT IS SO ORDERED.

DATED this 23 day of July, 2018.


Gloria M. Navarro, Chief Judge
United States District Court